

THE MARKS LAW FIRM, P.C.

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January 13, 2025

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**VIA ECF ONLY**

The Honorable Gregory H. Woods  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMORANDUM ENDORSED**

**RE: Case Name: Jocelyn Pierre v. 208 Rivington St Inc. and Lo-Ho LLC**  
**Docket Number: 1:24-cv-07766-GHW**  
**Court: U.S. District Court, Southern District of New York**  
**FIRST REQUEST FOR EXTENSION OF TIME**

Dear Honorable Judge Woods,

The undersigned represent Plaintiff in this action. Kindly accept this request as Plaintiff's **first request** for the adjournment/extensions of time requested below. This request is made pursuant to 1(e) of Your Honor's rules.

Plaintiff, respectfully requests that the following deadlines and appearances be rescheduled to the following proposed dates:

- 1) The initial conference be adjourned from **January 22, 2025, at 4 pm**, to **March 5, 2025, at 4:00 pm**;
- 2) The time for the parties to file a Joint Proposed Case Management Plan and Joint Letter be extended from **January 15, 2025**, to **February 26, 2025**;
- 3) Defendants time to answer or respond to the Complaint be extended from **November 14, 2024**, to **February 14, 2025**.

There have been no previous requests for the adjournment/extensions requested herein. The reason for this request is that since the inception of this action, Plaintiff has diligently prosecuted this action and made efforts to engage the defendants through a series of phone calls and written communications (letters and emails).

In a follow up call with both Defendants last week, we were informed by a principal of Defendant 208 Rivington St Inc. that this defendant is in the process of looking for counsel. In a call with outside counsel for Lo-Ho LLC, we were informed that this Defendant is in the process of retaining Jeremy Chylinski, Esq. of Gordon Rees Scully Mansukhani, LLP, and that the delay in the retention of counsel arose from third-party administrators assisting this defendant with this

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Action. On January 9, 2025, we reached out to Mr. Chylinski; however, he was out of the office. On January 13, 2025, Mr. Chylinski contacted our office and confirmed that he is in the process of being retained and sorting out issues related to retention and representation amongst the defendants. Accordingly, Mr. Chylinski consented to this request.

A copy of this letter was shared with Defendants via email prior to its filing. With Your Honor's permission, Plaintiff respectfully requests that it only be required to send Defendants a copy of Your Honor's determination of this request via the email addresses stated below.

Thank you for your attention to the above, please let us know if Your Honor requires any other information.

Very truly yours,



Darren R. Marks

CC: **VIA EMAIL ONLY**

Jeremy Chylinski, Esq.

Gordon Rees Scully Mansukhani, LLP

Email: jchylinski@grsm.com

Mr Freddie Carrillo

208 Rivington St Inc.


Email: pololo315@gmail.com

Application granted. Plaintiff's request to adjourn the initial pretrial conference, Dkt. No. 8, is granted. The initial pretrial conference scheduled for January 22, 2025 is adjourned to March 5, 2025 at 4:00 p.m. The joint status letter and proposed case management plan described in the Court's October 16, 2024 order are due no later than February 26, 2025. Plaintiff's request for an extension of the deadline for Defendant to answer or otherwise respond to the complaint is also granted. The deadline for Defendant to answer or otherwise respond to the complaint is extended to February 14, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 8.

SO ORDERED.

Dated: January 13, 2025

New York, New York



GREGORY H. WOODS  
United States District Judge